## **STATEMENT OF CLAIM**

- THE FIRST PLANTIFF WAS IN THE HOMELESS PROGRAM FOR MIRCI INC IN MAY 2018 TO OCTOBER 2019 PLACED IN THE LANDINGS APARTMENT ON COVENANT RD
- 2. THE SECOND PLANTIFF IS THE MINOR CHILD RESIDING IN THE SAME RESIDENCE ON COVENANT RD.
- 3. THE FIRST DEFENDANT IS THE EXECUTIVE DIRECTOR AND REGISTERED

  AGENT OF MENTAL ILLNESS RECOVERY KNOWN AS MIRCI INC AT 1408

  GREGG STREET COLUMBIA SC
- 4. THE SECOND DEFENDANT IS THE HOUSING CORDINATOR FOR MENTAL ILLNESS RECOVERY CENTER (MIRCI) INC SAME ADDRESS AS THE EXECUTIVE OFFICER
- 5. MENTAL ILLNESS RECOVERY CENTER (MIRCI) INC FAILED TO MAKE
  REASONABLE ACCOMADATIONS TO THE APARTMENT AFTER SEVERAL
  REQUESTS. BETWEEN MAY 29, 2018 AND OCTOBER 8, 2019
- 6. WE THE PLANTIFFS WERE DISCRIMINATED AGAINST BASED ON RACE AND DISABILTY AFTER AN OLDER CAUCASIAN WOMAN IN THE PROGRAM PUT THEM ON THE NEWS, SHE WAS IMMEDIATELY ASSISTED BUT WE WERE NOT.
- 7. THEY THEN RETAILATED AGAINST ME FOR REPORTING THE INCIDENT TO JANELL BANNISTER OF THE US DEPARTMENT OF HOUSING AND URBAN

DEVELOPMENT. THEY CALLED SOCIAL SERVICES AND MADE A FALSE COMPLAINT OCTOBER 7, 2019

## **PARTICULARS OF VIOLATIONS**

- a) TITLE VI AND VIII OF THE CIVIL RIGHTS ACT OF 1964
- b) VIOLATED CODES UNDER SOUTH CAROLINA CHILDRENS CODE SECTION 63-7-430 AND 63-7-440
- c) THE SOUTH CAROLINA FAIR HOUSING LAW MAKES IT ILLEGAL TO DISCRIMINATE IN HOUSING BECAUSE OF RACE, COLOR, RELIGION, SEX, NATIONAL ORIGIN, PHYSICAL OR MENTAL HANDICAPS, OR FAMILIAL STATUS (FAMILIES WITH CHILDREN).
- d) VIOLATION OF TITLE 24 OF THE HOUSING AND URBAN

  DEVELOPMENT CODES AS FOLLOWED: SUBCHAPTER A §100.7

  LIABILITY FOR DISCRIMINATORY HOUSING PRACTICES, SUBPART D

  §100.2 —PROHIBITION AGAINST DISCRIMINATION BECAUSE OF

  HANDICAP, AND SUBPART F—INTERFERENCE, COERCION OR

  INTIMIDATION

## **PRAYER FOR RELIEF**

- a) PUNATIVE DAMAGES FOR DISCRIMINATION, HARASSMENT, AND RETAILATION AMOUNT SOUGHT ONE HUNDRED SEVENTY-FIVE THOUSAND (\$175,000)
- b) THIS INCLUDES ANY COURT COST AND FEES GRANTABLE BY THE COURT
- c) COST FOR TEMPORARY HOUSING OF NINE THOUSAND FIVE HUNDRED DOLLARS (\$9500)
- d) OTHER RELIEF AS THE HONOURABLE COURT MAY DEEM FIT.